

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Manuel PEREZ-Ortiz

Case No. 5:21-mj-956-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 18, 2020 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

*Code Section*Title 31 United States Code,
Section 5332*Offense Description*

Whoever, with the intent to evade a currency reporting requirement under section 5316, knowingly conceals more than \$10,000 in currency on the person of such individual or in any conveyance, article of luggage, merchandise, or other container, and transports or transfers or attempts to transport or transfer such currency or monetary instruments from a place outside the United States to a place within the United States, shall be guilty of a currency smuggling offense and subject to punishment pursuant to subsection (b)

This criminal complaint is based on these facts:

See Attachment "A".

☒ Continued on the attached sheet./S/ Jose J. Gomez*Complainant's signature*Jose J. Gomez, Special Agent DEA*Printed name and title*

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed. R. Crim. P. 4.1:

Date: 04/27/2021
*Judge's signature*City and state: Laredo, TexasU.S. Magistrate Judge*Printed name and title*

Attachment A

On June 19, 2020, at approximately 1:40 p.m., Laredo Police Department (LPD) Officer Jaime E. Velasquez, operating LPD marked unit #1283, was traveling eastbound on the 3000 block of Saunders Street when officer Velasquez noticed a white in color Jeep Cherokee, displaying an obstructed temporary license plate (72495H3). The license plate was unsecured properly as it was flapping up and down with the wind. The temporary license plate was also secured with a license plate cover that obstructed the upper portion of the license plate. Officer Velasquez then noticed that the vehicle turned into the McCoy's parking lot located at 3809 Saunders Street. At that time, Officer Velasquez turned on his emergency lights and sirens indicating the vehicle to pull over to conduct a traffic violation stop. Officer Velasquez noticed that the passenger, Manuel Amador PEREZ-Ortiz, was moving around inside the vehicle making a lot of furtive movements as if he was trying to conceal something.

Officer Velasquez then asked both the driver and PEREZ-Ortiz to exit the vehicle. The driver gave Officer Velasquez consent to search the vehicle. Subsequently, a cardboard box was found on the rear passenger seat that contained a large amount of United States currency wrapped in multiple bundles. The amount of the currency totaled \$500,000.

After the currency was discovered, PEREZ-Ortiz stated that he had sold a ranch in Mexico and that he was looking to build a home in Laredo. In addition, PEREZ-Ortiz admitted that he had smuggled approximately \$500,000 U.S. currency from Mexico into the United States himself by illegally wading the Rio Grande River, thus bypassing the Port of Entry and the currency reporting requirement to U.S. Customs. PEREZ-Ortiz stated that he crossed the money into the United States the day prior to his arrest.

On said day, Drug Enforcement Administration (DEA) Agents took possession of the currency pending forfeiture proceedings.